

IN THE UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF MISSOURI

MARY R. BOWER, )  
AND )  
GABRIELLE LYON, )  
VS. ) CASE NO. 16-cv-3175-s-swH  
JORDAN VALLEY HEALTH CENTER )  
LINDA CLIMER, PERSONALLY AND )  
IN HER OFFICIAL CAPACITY, N.P. )  
MATTHEW STINSON, PERSONALLY AND )  
IN HIS OFFICIAL CAPACITY, M.D. )  
SPENCER DAVIDSON, PERSONALLY AND )  
IN HIS OFFICIAL CAPACITY, R.N. )  
JULIE HOWARD, PERSONALLY AND )  
IN HER OFFICIAL CAPACITY )  
COX AMBULANCE SERVICE )  
TESSA COLTRIN, PERSONALLY AND IN )  
HER OFFICIAL CAPACITY AT JORDAN )  
VALLEY COMMUNITY HEALTH CENTER )  
DEFENDANTS.

All Defendants are licensed by the State of Missouri.

**PLAINTIFF'S FIRST ORIGINAL PETITION FOR DAMAGES FOR  
CONSUMER FRAUD BY  
MEDICAL MAL-PRACTICE AND INTENTIONAL MEDICAL NEGLECT  
AND FALSE MEDICAL REPORTING  
IN INTEGRATED RECORDS BY FEDERALLY FUNDED  
CORPORATIONS**

**JURISDICTION**

The Federal district court has jurisdiction based upon two things: Consumer Fraud by Medical Mal-practice by Federally funded Parties receiving Medicaid payments for low income patients who worked in collusion in this case in retaliation for prior lawsuits filed by Plaintiffs.

**STATEMENT OF CLAIM**

Each of the Defendants herein named in the Petition have written false medical reports that have caused harm to the Plaintiffs individually and as a family unit. The Defendants all by integrating inaccurate and false medical reports have libeled both Mary Bower and Gabrielle Lyon to the harm of both causing the removal of J.V.L. by fraud from the home of both Plaintiff's. The abuse of medical mal-practice and neglect occurred from the onset of the Jordan Valley Clinic reporting erroneously that Gabrielle Lyon was mentally ill wherein the Clinic actually caused a chemical imbalance by prescribing a medication that she should have never been given in the first place because she was not depressed. The medication was given without the required mood stabilizer and alone would cause symptoms of mental illness. In fact, the clinic told Gabrielle to continue taking Budeprion during pregnancy which was clearly listed as a "do not take during pregnancy because of harm to the unborn child." Gabrielle was never told of the side effects and as Gabrielle was seen by different personnel at Jordan Valley Community Health at

different times during pregnancy Questioned by Plaintiff Bower about side effects they continued to ignore the concern from Plaintiff's about side effects on Gabrielle and her unborn child J.V.L. They all insisted she continue taking Budeprion which has 4 pages of side effects , Gabrielle suffering all but 4. In fact, by giving a medication Gabrielle should have never been given it caused chemical imbalance forcing behavior problems and personality changes listed as side effects and harmed both her and her unborn child during pregnancy, and has continued to harm Gabrielle's liver and pancreas. Gabrielle was diagnosed with Gestational Diabetes during pregnancy and Mary Bower asked requested specifically for Linda Climer to do a blood sugar because of Gabrielle's symptoms of diabetic behavior. Linda Climer refused and in fact slandered Gabrielle's medical records about her Mother Mary Bower. Bower asked about the recommendation from an MRI at Mercy continually for a solid year because of plaque on her daughter's brain, and was told numerous times that Medicaid would not pay for the Neurologist follow-up. This was completely untrue according to Medicaid. Petitioner Bower asked Linda Climer about the neurologist and instead Linda Climer sent Gabrielle to a psychologist who has admitted Gabrielle should have never been sent to him with her MRI prior findings. It is clear there is medical neglect with malicious intent to target Gabrielle in order to harm her Mother Mary Bower in retaliation for lawsuits filed in Springfield in the past and to target J.V.L. for removal from the home by giving Gabrielle a medication they knew had to have a mood stabilizer and had severe side effects in the generic unstabilized form given to Medicaid patients. In fact Bower has learned from other single Mother's on Medicaid that they too were given the unstabilized medicine at Jordan Valley Clinic and that their children were subsequently removed to

Foster Care. Plaintiff can produce the witnesses to this effect. In fact the clinic shut down the in-house pharmacy while Bower and Lyon filed the first suit that was dismissed.

Tessa Coltrin, Contract psychologist at Jordan Valley Community Health Center wrote derogatory remarks about Mary Bower in Gabrielle's records prior to the removal of Johanna and declared the problem was the Mother daughter relationship. She also said she tested Gabrielle when there was no test given. Her intent was to cause a break up of the family unit. Matthew Stinson, M.D. saw Gabrielle in a semi-catatonic state, and declared it schizophrenia, when in fact Matthew Stinson. M.D. , never tested Gabrielle for anything, and in fact knew or should have known she was exhibiting side effects of Budeprion, since other patients at Jordan Valley Clinic have exhibited the same from the same medication. The clinic routinely ignores the harm they are causing by prescribing a unstabilized medicine which clearly is malicious toward single Mother's on Medicaid. In fact Gabrielle was given too different types forms of the same medication, and initially by sample packets. Ryan Slead Defendant Paramedic wrote a false ambulance report when Gabrielle was exhibiting blood sugar problems.

Gabrielle had drug tests throughout her time at Jordan Valley that were always negative. Gabrielle has been high functioning Autistic since the age of three years and now is reduced to rarely talking after the effects of trauma from removing her child and the Budeprion side effects. Mary Bower discovered and reported to the clinic that both Gabrielle and J.V.L. who was invitro were simultaneously burping each time she took the Budeprion. Gabrielle had low Vitamin D levels during pregnancy which was ignored by the Clinic staff upon complaints by Bower and Gabrielle. She also had elevated leukocytes.

In addition Gabrielle had her teeth cleaned at Jordan Valley Dental Clinic after having Johanna and her gums became severely infected . It came out in the news that the clinic had used un-sterile

tools on patients. While they claimed a certain time frame this happened they have no way of knowing if it had happed more than one time. The Jordan Valley Clinic alerted some patients that they needed to be tested for Hepatitis, Aids and other infectious diseases. Gabrielle was also advised shortly after having Johanna by the Jordan Valley Community Health Clinic that she needed to get a vaccine booster unrelated to the Dental Clinic. Shortly after that we noticed even more inability for Gabrielle to communicate and comprehend.

Ryan Slead, Cox Ambulance Paramedic wrote a false hotline report that Gabrielle was suicidal on insistence of a particular Nixa Police Officer.

Gabrielle has never been suicidal in her life. She was transported for Blood sugar. Upon arrival she was asked about suicide and the record at Mercy reflects she was not suicidal. Ryan Slead shortly thereafter upon witness subpoena moved to Kansas City, In the E.R. at Mercy the attending physician reflected it could be blood sugar to us her Mother and Step-father. However by writing suicide Ryan Slead had Gabrielle sent for psyche eval without her knowledge. Julie Howard then told Spencer Davidson R.N. to hotline in a false report that she had pushed J.V.L. down, which never happened and he could not testify too. In fact Ryan Slead failed to appear in court to testify at removal hearings under subpoena.

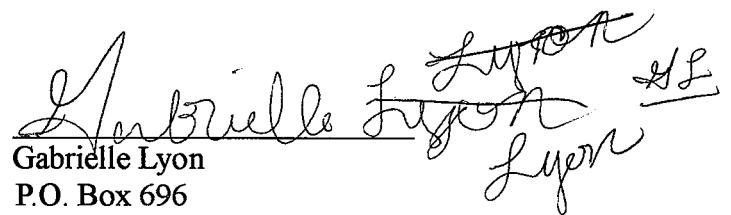
The false hotline done by Spencer Davidson Mercy R.N. on the insistence of psyche Nurse Julie Howard, after the Attending physician refused to hold Gabrielle for a psyche evaluation; was done by malice and retaliation for Gabrielle refusing medical psyche evaluation by Julie Howard. That false hotline was used to remove J.V.L. from her home and traumatize her, her Grandmother , Mary Bower and her Mother

Gabrielle Lyon, who lived with J.V.L. in her Mother's home which was unknown to the nurses at the hospital who apparently were believed Gabrielle lived alone with her daughter. The Springfield medical society by integrating false psychological reports caused Gabrielle's physical health to suffer. She was targeted for harm and they could then insure that she is forever falsely mentally ill. What a terrible thing to do to someone. All of this to improve the Missouri Economy when in fact taking the children from their parents wrongfully hurts them and the child. Both the Plaintiff's have suffered knowing that J.V.L. was wrongfully and removed from the home in an orchestrated abduction. Medical care became careless and care nothing (Consumer fraud in Service) for the damages perpetrated on the Plaintiffs by Jordan Valley Community Health Center other Defendants and their Consumer fraud in fraud in diagnoses, medial mal-practice, malice and retaliation. Plaintiff's have learned that a person who is an employee of the School district who Bower sued for allowing bullying on her daughter at SPS School district is on the Board of Directors at Jordan Valley Community Health Clinic.

Plaintiffs demand a Jury Trial and request damages in the amount of 6 million dollars against the Defendants, and for the court to issue U.S. Marshall Service on Defendant's and set trial scheduling order at the earliest onset possible.

**Attachments: Forma Pauperis Income form, and Motion to file Forma Pauperis**  
*+ Application for Appointed Attorney*  
Respectfully submitted May 5TH, 2016,

  
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Gabrielle Lyon  
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